

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
Jenkins & Clayman Eric J Clayman 412 White Horse Pike Audubon, NJ 08106 (856) 546-9696 Attorney for Debtor	
In Re:	Case No.: <u>15-23337</u>
Charles R. Milillo, Jr.	Judge: <u>JNP</u>
debtors	Chapter: <u>13</u>

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☒ Motion for Relief from the Automatic Stay filed by Santander Consumer USA, Inc., creditor.

A hearing has been scheduled for December 17, 2019, at 10:00 a.m.

- ☐ Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☐ Certification of Default filed by _____.

I am requesting a hearing be scheduled in this matter.

2. I am objecting to the above for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support of attached hereto.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

I fell a bit behind in my payments because my overtime was cut at work. I am now a manager making more money and I again am getting overtime. Therefore, I can cure the delinquency and resume regular payments. In fact, the certification by the bank says I'm due \$1,099.18 as of November 11, 2019. I made a payment of \$350.00 on November 15, 2019 so the arrears now are actually \$749.18. I am going to begin making additional payments of \$100.00 a month until the arrears are paid in full.

3. I certify under penalty of perjury that the above is true.

Date: December 10, 2019

/s/ Charles R. Milillo, Jr.
Debtor's Signature

Date: _____

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.